Continuous Disclosure Policy

Introduction

1. Ampol Limited (Ampol) is committed to the promotion of investor confidence by ensuring that trading in its securities takes place in a fair and informed market. Ampol's ordinary shares (Ampol securities) are listed on the Australian Securities Exchange (ASX).
2. Ampol must immediately notify the ASX of any information (unless certain exceptions apply under the ASX Listing Rules) that a reasonable person would expect to have a material effect on the price or value of Ampol's securities (market sensitive information). The ASX's guidance on the meaning of 'immediately' in this context is that it means promptly and without delay.
3. The *Corporations Act 2001* (Cth) (Corporations Act) provides that a reasonable person will be taken to expect information to have a material effect on the price or value of securities of a listed entity if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of those securities.
4. This policy applies to all employees, directors and officers of Ampol and its subsidiaries (Ampol Group) and any persons acting for, or engaged by, any member of the Ampol Group.

General approach

5. The continuous disclosure regime involves a high degree of judgment to determine when disclosure is required and the information that must be disclosed. Ampol will take a principles-based approach to disclosure to meet the letter and spirit of the continuous disclosure regime.
6. Information released to the market will be factual, not omit any market sensitive information and be expressed in an objective and clear manner.

Continuous disclosures

7. The Ampol Board has specific responsibility for disclosures in relation to the following matters:
   - financial results;
   - dividends;
   - profit outlooks;
   - resignations and appointments of directors and officers; and
   - key strategic decisions,

   and may, as required, delegate authority in relation to a disclosure of information to the ASX relating to these matters to a committee of the Ampol Board or to the Ampol Disclosure Officers.
8. The Ampol Disclosure Officers are authorised by the Ampol Board to approve disclosures to the ASX in relation to all other matters (including the form and content of such an announcement).
9. The ASX Listing Rules state that disclosure is not required if:
   - a reasonable person would not expect the information to be disclosed; and
   - the information is confidential and the ASX has not formed a view that the information has ceased to be confidential; and
   - one or more of the following five situations applies:
     - it would be a breach of a law to disclose the information;

- the information concerns an incomplete proposal or negotiation;
- the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
- the information is generated for the internal management purposes of the entity; or
- the information is a trade secret.

Ampol Disclosure Officers

10. The Ampol Board has appointed the following officers, or their delegates, as **Ampol Disclosure Officers** under this policy:

    - the Managing Director & Chief Executive Officer (MD&CEO);
    - the Group Chief Financial Officer; and
    - the Executive General Manager, Group General Counsel & Governance.

11. The Ampol Disclosure Officers are responsible for:

    - actively monitoring whether there is any information that may need to be disclosed to the market (including whether any information has been inadvertently or selectively disclosed);
    - actively monitoring the status of any matter that may require disclosure under ASX Listing Rule 3.1;
    - in accordance with clauses 7 and 8, approving the disclosure of information to the ASX (including the form and content of such an announcement) or recommending to the Chairman that an Ampol Board meeting be convened to consider the matter;
    - actively monitoring if a trading halt should be requested;
    - making relevant employees aware of Ampol's continuous disclosure obligations; and
    - developing and maintaining internal guidelines for promoting an understanding of compliance with this policy by Ampol and its employees.

12. Ampol has also appointed the Ampol Company Secretary as the primary person responsible for communications with the ASX in relation to Listing Rule matters.

Disclosure to the Market

13. Once the requirement to disclose information has been determined, the Ampol Company Secretary will coordinate the disclosure to the ASX.

14. Ampol will not publicly release information that is disclosed through the ASX until it has received formal confirmation of its release from the ASX.

15. All announcements to the ASX are made on the Ampol website as soon as practical following confirmation of release of the announcement from the ASX. The Ampol Board receives copies of all material market announcements promptly after they have been made.

Communications with Investors and Analysts

16. The Ampol Board has authorised the:

    - Ampol Chairman;
    - Ampol Managing Director & Chief Executive Officer;
    - Ampol Group Chief Financial Officer; and
    - Ampol General Manager, Investor Relations & Sustainability,

    as **Ampol Market Disclosure Officers** to represent Ampol and all members of the Ampol Group in all communications with investors and analysts.

17. No other Ampol employees are authorised to communicate with investors or analysts on behalf of Ampol or any member of the Ampol Group unless previously authorised by an Ampol Market Disclosure Officer to make that particular communication.

18. The Ampol Market Disclosure Officers may clarify the information that Ampol has publicly released to the ASX, but must not make additional disclosures of information that would be likely to have a material effect on the price or

value of Ampol securities, unless the information has been disclosed to the ASX in accordance with this policy and any relevant internal guidelines developed by the Ampol Disclosure Officers.

Analyst and investor briefings

19. Ampol views briefings with investors and analysts as important parts of a pro-active investor relations strategy. Ampol will only discuss previously disclosed information to the ASX and other publicly available information in such briefings.
20. All presentation material to be provided at a briefing to investors and/or analysts, or provided during a local or overseas roadshow, which has not been previously released, will be lodged with, and receipted by, the ASX prior to the briefing.
21. To prevent inadvertent disclosure of market sensitive information, during the periods between the end of Ampol's financial reporting periods and the results announcements, Ampol's directors and officers may not discuss any financial information, broker estimates or forecasts with investors, analysts or the media unless that information has previously been disclosed to the ASX.

No embargo of information

22. Ampol will not disclose market sensitive information publicly (for example, to investors, analysts or the media) under an embargo arrangement in any circumstances.

Prevention of a False Market

23. As a general rule, Ampol will not comment on rumours or speculation, including market rumours or media speculation.
24. Ampol acknowledges that, from time to time, it may be necessary to provide information to the ASX if the ASX (or another regulator) considers that there is or is likely to be a false market in relation to Ampol securities following a reasonably specific rumour or media comments. In these cases, Ampol will provide the ASX the information it requests to correct or prevent the false market.

Analyst Reports & Forecasts

25. Ampol will only comment, and any such comment will only be from the Ampol Market Disclosure Officers, on information contained in an analyst's report to the extent that the information:
    - has been previously disclosed by Ampol to the ASX or is otherwise in the public domain; and
    - contains factual inaccuracies on historical matters.
26. Ampol will not endorse, or be seen to endorse, analyst reports or the information contained in the reports. This means that no member of the Ampol Group will:
    - externally distribute an individual analyst's projections or reports;
    - refer to an individual analyst's recommendations on Ampol's website unless also referring to all other recommendations from analysts who formally report on Ampol; or
    - comment on an individual analyst's recommendations or proprietary research.

Trading Halts

27. In exceptional circumstances, it may be necessary for Ampol to request a trading halt from the ASX to prevent trading in Ampol securities taking place in an uninformed market. These circumstances may include if Ampol becomes aware of market sensitive information which must be disclosed:
    - during ASX trading hours and is not in a position to issue an announcement immediately; or
    - outside ASX trading hours and anticipates that it will not be in a position to issue an announcement before trading next commences.
28. The Company Secretary is authorised to request a trading halt from the ASX following consultation with the Ampol Disclosure Officers and/or the Ampol Board to the extent they are immediately available.

Policy Breaches

29. The Ampol Disclosure Officers will monitor compliance with this policy and report any material or recurring breaches to the Ampol Board.
30. A breach of this policy may lead to disciplinary action, which may include termination of employment in serious cases.
31. Additionally, a breach of the law relating to continuous disclosure can have serious consequences, including criminal and civil liability, for the company and for an individual.

Review of Policy

32. The Ampol Board will review this policy within six months of the second anniversary of its last review.

Publication

This policy will be made available from the Ampol website (www.ampol.com.au).

Document change history

Version number	Conducted by	Approved by	Date	Description of changes
1		Board	06/12/2018	
2	Secretariat	Board	14/05/2020	Update references from Caltex to Ampol
3	Secretariat	Board	19/02/2021	Updated trading halt authorisation process
4	Secretariat	Board	12/05/2022	Updated with respect to NZX listing and Z integration
5	Secretariat	Board	7/10/2024	Updated with respect to NZX delisting of Ampol Limited and Z Energy Limited
6	Secretariat	Board	27/10/2026	Updated for change in job title and minor formatting changes